



U.S. Department of Justice

*United States Attorney
District of New Jersey*

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July 14, 2022

The Honorable Esther Salas, U.S.D.J.
United States District Court
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *United States v. Woroboff, et. al.*
Crim. No. 21-907 (ES)

Dear Judge Salas:

We write to request a six-week extension of the Government's discovery deadline in the above-referenced matter until August 26, 2022. We also request an extension of time to respond to defendants Woroboff's and Willard's motions to compel (Dkt. Nos. 57 and 60), which are premature because the Government has not completed all discovery yet.

With respect to the discovery deadline, pursuant to the Court's Order, dated May 19, 2022, the deadline for the Government to produce discovery pursuant to Rule 16 is currently July 15, 2022. *See* Dkt. No. 53. The Government is seeking an additional six weeks to complete discovery—until August 26, 2022. Counsel for the other three defendants have consented to this extension. Only counsel for defendant Woroboff has objected.

The extension is necessary because of the complexity of the case. The Government has acted diligently and in good faith to comply with its discovery obligations. To date, the Government has produced a massive amount of information in discovery—approximately 200 gigabytes of data. At this point, the Government has one additional set of data that it received from its counterparts in the District of Tennessee. Before the Government can produce this last set of materials, however, it must conduct a filter review to ensure that any attorney-client privileged information is withheld from production to all defendants.

The Government anticipates that it can complete the filter process and produce the documents by August 26, 2022. Thus, the Government respectfully requests that the Court grant an extension of the discovery deadline until August 26, 2022.

With respect to defendant Woroboff's motion to compel—which defendant Willard's counsel recently joined (Dkt. No. 60)—the Court's May 19, 2022 Scheduling Order calls for the setting of a schedule for motions and consideration of discovery disputes at the status conference scheduled for August 16, 2022. *See* Dkt. No. 53. The defendants' motion to compel is therefore premature. Discovery is still ongoing, so the defendants have not even received, much less reviewed, all of the discovery in the case. It is entirely possible that once the Government completes discovery, the defendants' motion to compel will become moot. The Government therefore respectfully requests that the Court defer setting a schedule for any opposition to the defendants' motion to compel until after discovery is complete. Counsel for defendant Willard does not object to such a schedule. Counsel for defendant Woroboff defers to the Court on the scheduling.

Thank you for the Court's consideration of this matter.

Respectfully submitted,

PHILIP R. SELLINGER
United States Attorney



By: Sean M. Sherman
Emma Spiro
Assistant U.S. Attorneys

So Ordered this ____ day of July, 2022

Hon. Esther Salas
United States District Judge